

UNITED STATES DISTRICT COURT
 for the
Eastern District of Michigan

United States of America

v.

ALICIA CROFT

Case: 2:09-mj-30510
 Judge: Unassigned,
 Filed: 12-15-2009 At 10:58 AM
 ALICIA CROFT (LCB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

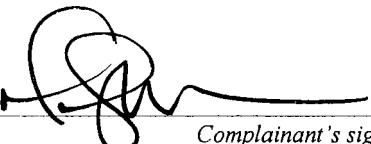
On or about the date of February 6, 2009 in the county of WAYNE in the EASTERN District of MICHIGAN, the defendant violated 18 U. S. C. § 2422(b), an offense described as follows:

Through use of any facility or means of interstate or foreign commerce, knowingly persuading, inducing, enticing, or coercing any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense.

This criminal complaint is based on these facts:

See Affidavit Attached

Continued on the attached sheet.


 Complainant's signature

Michael R. Glennon, Special Agent, FBI
 Printed name and title


 Judicial Officer signature
MONA K. MAJZOUB
 Printed name and title

Sworn to before me and signed in my presence.

Date: 12/15/09

City and state: Detroit MI

AFFIDAVIT

BACKGROUND

MICHAEL R. GLENNON, being duly sworn, deposes and states as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to the Bureau's Detroit Division. I have been a Special Agent with the FBI for nearly six years. I am currently assigned to investigate violent crime matters, as well as investigations involving crimes against children.
2. This affidavit is made in support of a criminal complaint against ALICIA MARIE CROFT.
3. Based upon the facts set forth below, there is probable cause to believe CROFT is guilty of violating 18 U.S.C. § 2422(b), coercion and enticement of a minor to engage in prostitution.
4. The facts set forth below are based in part on information from personal knowledge and in part on information provided by other federal agents, law enforcement officers, cooperating witnesses, documents and other records I have reviewed. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact or source of information establishing the violations of federal law.
5. This investigation to date has identified Alicia Marie Croft as an individual responsible for pandering minors and adults in the greater Detroit, Michigan area. The investigation has identified two minors and three adults advertised on the internet to include, but not limited to, website www.craigslist.org for the purpose of providing sexual acts in exchange for money between December 2008 to present.
6. This investigation to date has identified Alicia Marie Croft's, a.k.a. "Mandi", "Mariah", "Peaches", "Livewire" (hereafter referred to as Croft), current residence XXXXX Ohio Street, Detroit, Michigan 48204. Croft has an arrest record in Michigan for Misdemeanor Prostitution Accosting/Soliciting and a Misdemeanor Use of Computer to Commit a Crime. The investigation to date has revealed Croft is a known prostitute who is facilitating an ongoing criminal organization of adult and juvenile prostitution.
7. On February 10, 2009, Officers from the Southeast Michigan Crimes Against Children (SEMCAC) Task Force conducted an undercover prostitution sting involving advertisement number 1012952395 on www.craigslist.org for erotic services. Task Force Officer Detective Sergeant (D/Sgt) Edward Price of the Michigan State Police (MSP) arranged a date with a white female, "Cali," later identified and referred hereafter as FBI-

J-1, by calling (734) XXX-XXXX¹, the telephone number listed on the aforementioned advertisement. D/Sgt Price was instructed by the female answering the telephone call to meet her at the La Quinta Hotel, Room 310, located at 41211 Ford Road, Canton, Michigan.

- a. At approximately 5:00 PM, D/Sgt Price entered room #310 after a female identified herself as "Cali." The female advised the date would be \$125.00 for the half hour and that she had a condom, then pointed to the night stand. D/Sgt Price handed over \$125.00 of pre-recorded funds. FBI-J-1 advised there would be no kissing, no digital penetration of her vagina and no anal sex, however, she would perform oral sex. FBI-J-1 proceeded to get completely undressed, laid on the bed, and began to digitally penetrate herself.
- b. FBI-J-1 was taken into custody by D/Sgt Price and charged with Prostitution, Accosting and Soliciting through the State of Michigan, and subsequently transported MSP Detroit Post for questioning. FBI-J-1 at the time of arrest was an adult, however, during the course of the investigation it was determined she was a victim of child exploitation.
- c. Prior to the aforementioned arrest, outside surveillance of the La Quinta Hotel observed an unknown female later identified as Alicia Marie Croft drop off FBI-J-1 in a 2008 Hyundai, at the back door of the hotel. Croft was subsequently taken into custody by D/Sgt Price and charged with Transporting a Female for the purpose of Prostitution.
- d. An interview of FBI-J-1 revealed she had met Croft prior to her eighteenth birthday. Shortly after the two met, FBI-J-1 began working for Croft as a prostitute. Croft set up the prostitution appointments and handled all of the advertising. FBI-J-1 advised there was an additional female, "Wet Wet", later identified and hereafter referred to as FBI-J-2, was working for Croft as a prostitute.
- e. An interview of Croft revealed she has been working as a prostitute and/or facilitator for approximately seven years. Croft estimated that she has had approximately 5 girls work for her as prostitutes. On February, 10 2009, Croft posted an advertisement for FBI-J-1, set up the appointment, and drove FBI-J-1 to the La Quinta Hotel in Canton, Michigan, to perform sexual acts in exchange for money.
- f. Croft advised all telephone numbers she used to post advertisements for prostitution on www.craigslist.org were; (586) XXX-XXXX, (734) XXX-XXXX and (734) XXX-XXXX. Croft was then shown advertisement

¹ Telephone number (734) XXX-XXXX was used in multiple advertisements for prostitution on www.craigslist.org.

number 1023774395 retrieved from www.craigslist.org², who she advised was FBI-J-2.

- g. FBI-J-2 began working for Croft as a prostitute in late January 2009. Croft took the pictures of FBI-J-2 found on advertisement 1023774395 and arranged for all her dates. Croft provided transportation to all incall³ and outcall⁴ appointments. Croft arranged for FBI-J-2 to go on approximately seven prostitution calls over a two week period. For FBI-J-2's services, Croft would charge \$125.00 for a half hour and \$175.00 for a full hour of incall services and \$200 for an hour long outcall. For an incall appointment, Croft would keep \$50.00 and for an outcall she would keep \$75.00. Croft had seen FBI-J-2's identification card and knew she was only 17 years at the time she (FBI-J-2) was working for Croft as a prostitute.
- h. Croft took a number of pictures of FBI-J-2 using her camera for images to be posted on the internet to advertise for prostitution. Croft advised FBI-J-2 also had professional pictures taken; however, a client paid for the service.
- i. FBI-J-2 was interviewed on February 21, 2009, and advised she had worked for Croft for about two weeks starting at the end of January 2009. Croft arranged all of the dates and would call when she had an appointment. FBI-J-2 was shown a number of pictures obtained from advertisement 1023774395 posted on www.craigslist.org on February 6, 2009, and confirmed the individual in the images were of her. FBI-J-2 further advised Croft took the images of her in a hotel room.

8. The source code viewing page was accessed for advertisement 1023774395 from www.craigslist.org, which revealed the images were uploaded through user account 139017 on www.imagedeposite.com⁵. Account 139017 was accessed which revealed not

² Advertisement 1023774395 from www.craigslist.org posted on February 6, 2009, titled "A++++++SUPER MODEL 5'11" 135lbs. ALL NATURAL.....-w4m - 21 (INCALL/OUTCALL)." The body of the advertisement contained text which read "ALL NIGHT LONG.. Super model here for u. I am 5'11 and 135lbs. Long red and black hair. 36DD's all natural 24-38 ok I finally measured it. I enjoy every minute of pleasing U. Call me at 586-XXX-XXXX ask for me WET WET." The body of the advertisement also contained five images of a black female in a number of different poses.

³ Incall appointments are where prostitutes have their own hotel room, and customers come to them.

⁴ Outcall appointments are where a prostitute will come to a customer's location.

⁵ Source code viewing is accomplished on Internet Explorer by clicking the "View" tab, then selecting "Source". The format of the page then transitions from graphics to the actual code written to represent the graphic traits on the web page.

only the five pictures uploaded to the advertisement but an additional image of FBI-J-2 posing in a provocative manner focusing on her genitalia.

9. On March 31, 2009, TFO Deputy Erin Diamond performed a forensic review in accordance with a warrant obtained from the Oakland County Prosecutor's Office, of a Gateway laptop computer, serial number 1MA80000026 owed by Croft, and seized by TFO D/Sgt Price.

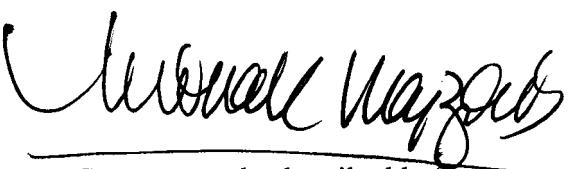
- a. A review of the aforementioned computer revealed a folder on the hard drive labeled "20090126 wetwet" which contained five images of FBI-J-2 completely naked posing in front of a bathroom vanity taken on January 26, 2009. A second folder labeled "20090127 WET2" contained an image of FBI-J-2 laying face down with underwear and no bra, buttocks raised and focused on the genital area, taken on January 27, 2009.
- b. A review of the aforementioned computer revealed a folder on the hard drive labeled "Cali" which contained sixty-seven images of FBI-J-1 posing in a number of different setting either in lingerie, partially or completely naked. Image "IMG_1960.JPG," "IMG_1961.JPG," and "IMG_1962.JPG," depict FBI-J-1 posing in a provocative manner on a bed, naked, with a see trough garment over her. The images focus on the genital area and were created on September 30, 2008, when FBI-J-1 was seventeen years old.
- c. A review of the aforementioned computer revealed a folder on the hard drive labeled "2008 11 11 Cali" which contained image "Cali 012," and "Cali 013" taken on October 5, 2008 of a birthday cake with "18 Birthday Cali" written on it.

CONCLUSION

Based on the above information, I have probable cause to believe that there have been one or more violations of 18 U.S.C. § 2422(b), coercion and enticement of a minor to engage in prostitution.



MICHAEL R. GLENNON
Special Agent
Federal Bureau of Investigation


Sworn to and subscribed before me
this 15th day of December, 2008.